

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

**IN RE: BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION**

No. 2:15-MD-02641-DGC

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**This Document Relates to All Actions**

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**JOINDER OF MARC J. BERN & PARTNERS LLP  
IN THE RESPONSE OF FREESE & GOSS AND MATTHEWS & ASSOCIATES  
IN OPPOSITION TO THE MOTION TO FILE UNDER SEAL FILED BY  
PLAINTIFFS' CO-LEAD COUNSEL AND THE PEC**

The law firm of Marc J. Bern & Partners LLP, on its own behalf and as the legal representative for plaintiffs with claims filed in the Bard IVC Filter MDL, hereby joins in the relief and arguments set forth in the “Response in Opposition to the Motion to File Under Seal filed by Plaintiffs’ Co-Lead Counsel and the PEC” filed by Freese & Goss and Matthews & Associates (Doc ID 21442).

Dated: February 12, 2020.

Respectfully submitted,  
MARC J. BERN & PARTNERS LLP

/s/ Debra J. Humphrey  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of February 2020, a copy of the foregoing document was filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access this filing through the Court's system and notice of this filing will be sent to these parties by operation of the Court's electronic filing system.

By: /s/ Debra J. Humphrey